

RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
ratkins@paulweiss.com
CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)
cgrusauskas@paulweiss.com
ANDREA M. KELLER (*Pro Hac Vice* admitted)
akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DECLARATION OF VERONICA
GROMADA IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S ADMINISTRATIVE MOTION TO
SEAL**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 I, Veronica Gromada having personal knowledge of the following state:

2 1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for
3 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am
4 a member in good standing of the Bar of the State of Texas and admitted *pro hac vice* in this litigation.
5 I know the following facts to be true of my own knowledge, except those matters stated to be based
6 on information and belief, and if called to testify, I could competently do so.

7 2. I respectfully submit this declaration in support of Uber’s administrative motion to seal,
8 dated September 6, 2024.

9 3. I have reviewed Exhibit B to my declaration in support of Uber’s letter brief regarding
10 Plaintiffs’ subpoena to Ballard Partners. This exhibit consists of three contracts between Ballard
11 Partners and Uber and a termination letter. It contains confidential information and terms regarding
12 Uber’s contractual and business relationship with Ballard Partners. The disclosure of this document
13 could harm Uber’s marketplace standing and cause undue harm if publicly disseminated.
14

15
16
17 I declare under penalty of perjury that the foregoing is true and correct.

18
19 Executed on September 6, 2024.

By: /s/ Veronica Gromada

20 Veronica Gromada
21
22
23
24
25
26
27
28